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July 2, 2015

**VIA CM/ECF ONLY**

Hon. Madeline Cox Arleo  
United States District Judge  
United States District Court, District of New Jersey  
Martin Luther King, Jr. Federal Building & Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: Theodore Van Leer, et al. v. Invictus Asset Management LLC, et al.  
U.S. District Ct. - D. NJ - Case No: 2:15-cv-01878-MCA-JBC

Dear Judge Arleo:

We are counsel for the plaintiffs, Theodore Van Leer, Caroline Van Leer, Anne M. Blanken, and Anne M. Blanken, as Trustee of the Credit Shelter Trust ("Plaintiffs"), in the above-referenced matter. On June 23, 2015, Defendant Phillips Wiegand Jr. ("Mr. Wiegand") filed a Motion to Dismiss the Complaint in this matter. *See*, Docket Entry No. 17. Pursuant to the Local Civil Rules of Court, Plaintiffs' response to the Motion to Dismiss is due to be served on or before July 6, 2015; and the Motion Day on which the motion is currently scheduled to be considered is July 20, 2015.

Upon consultation with counsel for Mr. Wiegand, Mr. Wiegand has consented to allow Plaintiffs an extension of time to prepare and file their response to the Motion to Dismiss. Thus, we respectfully request the Court enter an Order extending the parties' deadlines on the Motion to Dismiss as follows:

August 3, 2015    Plaintiffs' deadline to file Opposition Papers

August 10, 2015    Mr. Wiegand's deadline to file Reply Papers

August 17, 2015    Motion Day

This is the parties' first request for an enlargement of the deadlines related to the Motion to Dismiss, is proffered in good faith and not for the purpose of unduly delaying the forward progress of this case, and has been consented to by the movant.

In view of the parties' agreement, we ask that the Court enter an Order extending the parties' deadlines on the Motion to Dismiss accordingly.

Hon. Madeline Cox Arleo  
July 1, 2015  
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We thank the Court for its attention to this matter and remain available if the Court wishes to discuss any aspect of the parties' request.

Very Truly Yours,

*Michael L. Braunstein*  
Michael L. Braunstein, Esq.

cc (via CM/ECF):

Glenn R. Reiser, Esq. and William C. Robinson, Esq. (*Counsel for Defendant, Phillips Wiegand, Jr.*)  
Adolfo J. Anzola, Esq. (*Co-Counsel for Plaintiffs*)